

Application Serial No.: 09/682,609

Attorney Docket No.: 59589.000015
Client Reference: 51SS-7212

and

providing an auxiliary trailer having
auxiliary equipment for use during operation of the engine;
attaching the air filtration trailer to the main trailer;
attaching the exhaust trailer to the main trailer; and
attaching the auxiliary trailer to the main trailer.

24. (Once amended) The method of claim 20, wherein the main trailer further
comprises

switchgear electrically connected to the electric generator.

REMARKS

Claims 1, 2, 5-16, 18-21, and 24-34 are pending in the application. By this Amendment, the drawings are amended by the addition of Fig. 6, claims 1, 5, 16, 20 and 24 and the specification are amended and claims 3, 4, 17, 22 and 23 are canceled without prejudice or disclaimer to the subject matter set forth therein. Reconsideration and allowance in view of the foregoing amendments and following remarks are respectfully requested.

No new matter has been added by this Amendment. Support for the amendments to the specification and the drawings may be found in paragraphs 6, 15, 16, 17, 18 and 20; claims 10, 11, 13 and 14; and in the originally filed drawings, for example. It is noted that Fig. 6 has been added as requested by the Examiner.

The Office Action Cover Sheet (PTO-326) indicates that the specification is objected to by the Examiner. However, the basis of the objection is not otherwise set out in the Office

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Action. The Examiner is respectfully requested to clarify the objection.

I. THE EXAMINER INTERVIEW

On April 24, 2003 a telephonic interview was conducted between Examiner Cuevas and Applicant's representative. Applicant appreciates the courtesies extended in the Interview. The substance of the Interview is incorporated into the comments below.

II. THE DRAWINGS AND SPECIFICATION

In the April 24, 2003 Interview, Examiner Cuevas requested that a figure be added showing the assembled mobile power generation unit. Accordingly, as requested by the Examiner, Fig. 6 and a corresponding description have been added to illustrate the assembled mobile power generation unit in accordance with one embodiment of the invention. The added Fig. 6 and the corresponding description are inherent in the existing specification and drawings, and no new matter has been entered by this Amendment, as noted above. As also requested by the Examiner, added Fig. 6 specifically shows a gas turbine disposed in the mobile power generation unit.

The Examiner is requested to review and approve the added Fig. 6. Further, the Examiner is respectfully requested to contact Applicant's representative if the Examiner has any further requests or comments relating, in particular, to the added Fig. 6 and the corresponding specification.

III. THE CLAIMS DEFINE PATENTABLE SUBJECT MATTER

The Office Action rejects claims 1-34 under 35 U.S.C. §103 as being unpatentable over U.S. Patent No. 4,136,432 to Melley, Jr. (Melley) in view of U.S. Patent No. 4,992,669 to Parmley. The rejection is respectfully traversed.

Claim 1 recites a mobile power generation system, comprising a main trailer having

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an engine, wherein the engine is a gas turbine; and an electric generator turned by the engine; an air filtration trailer having air filtration equipment for filtering air used as inlet air to the engine; an exhaust trailer having a part of an exhaust silencing system for reducing engine output noise; and an auxiliary trailer having auxiliary equipment for use during operation of the engine.

The Office Action alleges that Melley teaches various features of the claimed invention including a main trailer having a gas turbine engine (81) as well as other features, but that Melley fails to disclose air filtration, exhaust and auxiliary trailers. The Office Action further asserts that Parmley teaches the construction of a modular energy system which includes separable driving and driven units for the purpose of rapidly and easily replacing the units as needed. The Office Action also asserts that it would have been obvious to one skilled in the art to use the modular system configuration disclosed by Parmley on the mobile electric power generating system disclosed by Melley for the purpose of rapidly and easily replacing the units as needed. The assertions set forth in the Office Action are traversed.

Melley relates to mobile electric power generating systems and more particularly to improvements in mobile electric power generating systems of the type comprising an enclosed trailer for carrying prodigious electric power generating equipment. In column 1, Melley describes that the Melley invention pertains to improvements in trailer enclosures which provide better access to, and facilitate improved assembly of trailer-mounted electric power generating systems having generating capacities ranging from about 100 kilowatts up to and exceeding 1000 kilowatts.

In column 2, lines 64-68, Melley teaches that one embodiment includes a trailer 15, a

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trailer enclosure 20, a power plant 80, and a utility frame 90. These components are combined to form a self-contained mobile electric power generating system. Melley further teaches in column 3, lines 43-53, that power plant 80 typically includes an electric power generator 82, and an engine 81 for turning generator 82. Power plant 80 may also include a control panel 83 for monitoring and operating both engine 81 and generator 82. Melley describes that in one preferred embodiment, engine 81 is a V-12 turbocharged diesel manufactured by Waukesha Engine Division of Dresser Industries and identified as Waukesha Model Number L5792DSIU. The generator 82, to which this engine is preferably connected, is a 600 KW electrical generator manufactured by Kato Engineering Co.

As noted above, the Office Action asserts that Melley teaches a main trailer having a gas turbine engine. However, in contrast to this assertion set forth in the Office Action, Melley fails to teach, for example, the "gas turbine" as recited in claim 1 (as was previously recited in claim 3). Instead, Melley teaches that the engine 81 is a V-12 turbocharged diesel. Further, Melley fails to teach or suggest the other specifics of claim 1, including the specifics of the air filtration trailer, the exhaust trailer and the auxiliary trailer.

It is respectfully submitted that Parmley fails to cure the deficiencies of Melley. Parmley is directed to a modular energy system including separable driving and driven units and a transfer system for rapidly and easily replacing these units as needed. The driving unit includes a power plant and associated controls protectively housed in a sturdy module container. Parmley teaches that the driven unit includes shaft drivable equipment and associated controls protectively housed in another sturdy module container; and that a disconnectable drive shaft extendable between the containers drivingly connects the output of the power plant with the equipment.

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In column 2, line 43 - column 3, line 5, Parmley teaches that the energy system includes a prime mover, such as an engine, motor or turbine, and a driven load, such as a generator, compressor or water pump. The energy system preferably includes two modules, one housing the prime mover and one housing the driven load. The modules are made from sturdy, internationally standardized, ocean cargo containers that are used to transport products by land or sea. Parmley further describes that the prime mover module contains an engine, an electric motor, a turbine or any other power source that supplies shaft driven power. The driven unit contains a generator, a water pump, a compressor or any other piece of equipment that can be shaft driven. Parmley describes that many combinations of different modules can be connected together end-to-end by a commonly adaptable drive shaft. Parmley further describes that Fig. 1 of Parmley shows a first embodiment that comprises a prime mover module shown generally at 50 and a driven module shown generally at 52. A drive shaft 54 drivingly and operatively connects the motor 56 of the prime mover module 50 to the shaft driven compressor 58 of the driven module 52. The motor 56 can be a standard seven hundred horse power electric motor, and the compressor 58 can be a standard six hundred ton refrigeration compressor.

It is respectfully submitted that Parmley fails to cure the deficiencies of Melley so as to fairly teach the claimed invention. To explain and as was discussed in the April 24, 2003 Interview, the claimed gas turbine as recited in claim 1 is substantially different than the turbocharged diesel engine of Melley, and the claimed arrangement as recited in claim 1 reflects this difference. That is, the features of claim 1 reflect the high power output of a gas turbine in the claimed arrangement. Illustratively, a gas turbine may be distinguished from a gas engine, a diesel engine and/or a turbocharged diesel engine based on the fact that a gas

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turbine is not an internal combustion engine, i.e., a piston engine. That is, in contrast, a gas turbine may be characterized as an external combustion engine in that it has no pistons and since the gas turbine is sealed by air pressure.

Accordingly, even if Melley was somehow modularized, Melley simply does not teach the components as recited in the claimed invention including a gas turbine. The inventors of the present invention recognized the requirements of a high power mobile power generation unit and developed a specific arrangement to address the problems faced by such a gas turbine assembly. This particular arrangement is recited in claim 1. For example, one feature of claim 1 is that the gas turbine and the electric generator are disposed on the main trailer, the electric generator being turned by the gas turbine. The claimed arrangement thus does not require a disconnect between the gas turbine and the electric generator upon dismantling the mobile power generation system, i.e., for transport. Accordingly, the claimed arrangement allows for the utilization of gas turbines yielding high power, such as 30,000 horsepower, for example.

The Office Action notes that making an old device portable or movable without producing any new and unexpected result involves only routine skill in the art; and that it has been held that constructing a formally integral structure in various elements involves only routine skill in the art. However, it is respectfully submitted that the claimed invention provides a specific arrangement of components to allow use of a gas turbine in a mobile power generation unit, and that this claimed arrangement is not taught or suggested by the applied art. Melley of course does teach a mobile system. However, even if Melley was somehow modularized, Melley would still fail to teach the components of claim 1, much less the particular arrangement of claim 1, e.g., Melley fails to teach a gas turbine and the

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particular arrangement between the trailers.

Further, the modularization disclosure of Parmley teaches away from the claimed invention. That is, as described above, Parmley teaches that a drive shaft 54 drivingly and operatively connects the motor 56 of the prime mover module 50 to the shaft driven compressor 58 of the driven module 52, for example.

For at least the above reasons, Applicant respectfully submits that independent claim 1 defines patentable subject matter. Further, it is submitted that independent claims 16 and 20 define patentable subject matter for reasons similar to those set forth above with respect to claim 1.

The dependent claims variously depend from claims 1, 16 and 20 and therefore also define patentable subject matter for the reasons set forth above with respect to the independent claims, as well as for the additional features such dependent claims recite.

It is respectfully submitted that claims 1, 2, 5-16, 18-21, and 24-34 define patentable subject matter. Reconsideration and withdrawal of the rejection under 35 U.S.C. §102 is respectfully requested.

IV. CONCLUSION

For at least the reasons outlined above, Applicant respectfully asserts that the application is in condition for allowance. Favorable reconsideration and prompt allowance of the claims are respectfully solicited.

Should the Examiner believe anything further is desirable in order to place the application in even better condition for allowance, the Examiner is invited to contact Applicant's undersigned representative at the telephone number listed below.

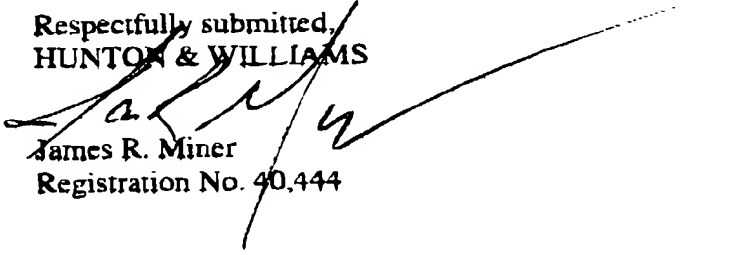
For any fees due in connection with filing this Response the Commissioner is hereby

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authorized to charge the undersigned's Deposit Account No. 50-0206.

Respectfully submitted,
HUNTON & WILLIAMS


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Attachments:
Appendix
Fig. 6

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Dated: May 20, 2003

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[0012] Fig. 5 is a side schematic view of an example of an exhaust trailer in accordance with the invention; and

Marked Up Version Of Replacement Claims As Per 37 C.F.R. § 1.121

1. (Once amended) A mobile power generation system, comprising:
 - a main trailer having
 - an engine, wherein the engine is a gas turbine; and
 - an electric generator turned by the engine;
 - an air filtration trailer having
 - air filtration equipment for filtering air used as inlet air to the engine;
 - an exhaust trailer having
 - a part of an exhaust silencing system for reducing engine output noise;
 - and
 - an auxiliary trailer having
 - auxiliary equipment for use during operation of the engine.
5. (Once amended) The system of claim 4, wherein the main trailer further comprises
- switchgear electrically connected to the electric generator.
16. (Once amended) A main trailer for use with a plurality of other trailers, the main trailer being capable of connecting to the other trailers to form a power generation

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system, the main trailer comprising:

a gas turbine;

an electric generator turned by the gas turbine;

a generator lineside cubicle; and

switchgear,

wherein the switchgear is hardwired to the generator lineside cubicle; ~~and~~

~~wherein the other trailers comprise:~~

~~an air filtration trailer having air filtration equipment for filtering air
used as inlet air to the gas turbine;~~

~~an exhaust trailer having a part of an exhaust silencing system for
reducing engine output noise; and~~

~~an auxiliary trailer having auxiliary equipment for use during
operation of the engine.~~

20. (Once amended) A method of providing a mobile power generation system,
comprising:

providing a main trailer having

an engine, ~~wherein the engine is a gas turbine,~~ and

an electric generator turned by the engine;

providing an air filtration trailer having

air filtration equipment for filtering air used as inlet air to the engine;

providing an exhaust trailer having

a part of an exhaust silencing system for reducing engine output noise;

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and

providing an auxiliary trailer having

auxiliary equipment for use during operation of the engine;

attaching the air filtration trailer to the main trailer;

attaching the exhaust trailer to the main trailer; and

attaching the auxiliary trailer to the main trailer.

24. (Once amended) The method of claim ~~23~~20, wherein the main trailer further

comprises

switchgear electrically connected to the electric generator.

- END OF APPENDIX -